

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

In re Patent Application of:
Jens Barrenscheen et al.

Application No.: 10/727,102

Confirmation No.: 4397

Filed: December 2, 2003

Art Unit: 2181

For: Arrangement comprising a first semiconductor
chip and a second semiconductor chip connected
thereto

Examiner: C. K. Lee

RESPONSE TO EXAMINER'S ANSWER

MS Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Madam:

This Reply Brief is filed pursuant to 37 CFR § 41.41(a), and is responsive to the Examiner's Answer mailed on November 5, 2008, in the above identified U.S. Patent application. As required under § 41.41(a), this Reply Brief is filed within two months of the Examiner's Answer.

No fees are believed due for the filing of this Reply Brief. However, if any fee is due, the Patent Office is authorized to charge such fee to Deposit Account No. 50-2215.

As described in Appellants' Appeal Brief, claims 2-4, 6-20 and 22-25 are patentable over the references cited by the Examiner. Appellants maintain each argument presented in the Appeal Brief. Further, in response to the Examiner's Answer, Appellants have the following additional remarks.

In the Answer, the Examiner has maintained substantially the same reasoning as previously set forth in the Office Actions, arguing that Balasundram (U.S. Patent No. 5,657,325) teaches “wherein a first portion of data transmitted in a frame is intended for a first, second semiconductor chip, and a second portion of the data transmitted in this frame is intended for a second, second semiconductor chip,” as required by each of independent claims 23-25. More particularly, the Examiner contends that Balasundram teaches time division multiplexing and concludes, without support, that Balasundram therefore reads on the explicitly recited limitation. Appellants reiterate that Balasundram cannot be read this way.

One of ordinary skill in the art knows that using time-division multiplexing, two or more signals or bit streams can be transferred as sub-channels in one communication channel by physically taking turns on the channel. Moreover, Balasundram discloses that data signals are sent through a series of time intervals using multiple byte waveform technology. Employing time division multiplexing techniques, and as disclosed in Balasundram, data signals are sent through the system during each of a series of time intervals. (See Balasundram paragraph [0046].) As such, Balasundram discloses that each data signal can be transmitted at a single respective time interval.

In contrast, independent claims 23-25 require that different portions of the same frame include both data intended for a first, second semiconductor chip and data intended for a second, second semiconductor chip. Balasundram simply does not disclose that a plurality of data is transferred to different receivers utilizing a single allotted time interval (*e.g.*, a single frame).

Rather, in Balasundram, data intended for a single receiver is transmitted on a single time interval. This feature of Balasundram is highlighted in that each multiple byte waveform message has an identifier address that signifies the start of each message. “This is an identifier address that is unique to the communicating transmitter and receiver pairs and ensures that the receiver ignores all signals not preceded by this address.” (See paragraph [0039] of Balasundram.) Therefore, each data signal, *i.e.*, data in a given multiple byte waveform message, is received by only the single receiver that recognizes the specific identifier address.

Accordingly, for at least the reasons set forth above, and those identified in the Appeal Brief, Appellants respectfully reassert that the claims are patentable over the applied references. Accordingly, reversal of the final rejection of all claims is respectfully requested.

Dated: December 15, 2008

Respectfully submitted,

/Laura C. Brutman/

By _____

Laura C. Brutman

Registration No.: 38,395

DICKSTEIN SHAPIRO LLP

1177 Avenue of the Americas

New York, New York 10036-2714

(212) 277-6500

Attorney for Applicant